

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF ILLINOIS EASTERN DIVISION**

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|--------------------------------|---|----------------------------|
| CENTRA, INC. and DETROIT |) | |
| INTERNATIONAL BRIDGE COMPANY |) | |
| |) | Case Nos. 07C 6312 |
| Plaintiffs/Counter-Defendants, |) | |
| |) | |
| |) | Hon. William T. Hart |
| vs. |) | |
| |) | |
| |) | Magistrate Judge Schenkier |
| CENTRAL STATES SOUTHEAST AND |) | |
| SOUTHWEST AREAS PENSION FUND, |) | |
| |) | |
| Defendant/Counter-Plaintiff. |) | |

**DEFENDANT/COUNTER-PLAINTIFF’S MOTION FOR LEAVE TO FILE
ADDITIONAL APPEARANCES PURSUANT TO LOCAL RULE 83.17**

NOW COMES Defendant/Counter-Plaintiff Central States Southeast and Southwest Areas Pension Fund (“Central States”), by and through its counsel Sonnenschein, Nath & Rosenthal LLP, and in support of Defendant/Counter-Plaintiff’s Motion for Leave to File Additional Appearances Pursuant to Local Rule 83.17, states as follows:

1. On or about November 7, 2007, CenTra, Inc. (“Centra”) and Detroit International Bridge Company (“DIBC”) (collectively, “Plaintiffs”) filed this lawsuit against Central States seeking to enforce an opinion issued by Richard I. Bloch pursuant to a statutorily mandated arbitration procedure under Title IV of the Employee Retirement Income Security Act of 1974 (“ERISA”), as amended by the Multiemployer Pension Plan Amendments Act of 1980 (“MPPAA”), 29 U.S.C. §§ 1381-1453.

2. On or about November 9, 2007, Central States retained the law firm of Sonnenschein, Nath & Rosenthal LLP to represent Central States in this matter. Richard L. Fenton, Frank P. Vanderploeg and Geoffrey J. Repo are currently attorneys licensed to practice in Illinois.

3. Richard L. Fenton, Frank P. Vanderploeg and Geoffrey J. Repo are attorneys admitted to the General Bar of the United States District Court for the Northern District of Illinois. Further, Richard L. Fenton is an attorney admitted to the Trial Bar of the United States District Court for the Northern District of Illinois.

4. Richard L. Fenton, Frank P. Vanderploeg and Geoffrey J. Repo are currently in good standing throughout Illinois and before the District Court for the Northern District of Illinois.

5. Draft appearances for Richard L. Fenton, Frank P. Vanderploeg and Geoffrey J. Repo are attached hereto as Exhibit "A."

WHEREFORE, Defendant/Counter-Plaintiff Central States Southeast and Southwest Areas Pension Fund respectfully requests that this Honorable Court grant its motion, thus permitting Richard L. Fenton, Frank P. Vanderploeg and Geoffrey J. Repo to file their appearances, and for such other and further relief as this Court deems just and appropriate under the evidence and circumstances.

Dated: January 17, 2008

Respectfully submitted,

By: /s/ Richard L. Fenton
One of the Attorneys for Defendant/Counter-Plaintiff
Central States Southeast and Southwest Areas Pension
Fund

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing **Notice of Motion** and **Defendant/Counter-Plaintiff's Motion for Leave to File Additional Appearances Pursuant to Local Rule 83.17** was filed electronically with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, this 17th day of January, 2008, using the CM/ECF system, which sent email notification of those filings to all parties listed below:

| | |
|--|---|
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